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8 *Attorneys for Defendants Reed Hein & Associates,*
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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

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13 DIAMOND RESORTS INTERNATIONAL, INC., a)
Delaware corporation; DIAMOND RESORTS)
14 CORPORATION, a Maryland corporation;)
DIAMOND RESORTS U.S. COLLECTION)
15 DEVELOPMENT, LLC, a Delaware limited liability)
company; and DIAMOND RESORTS)
16 MANAGEMENT, INC., an Arizona corporation,)

17 Plaintiffs,

18 vs.

19 REED HEIN & ASSOCIATES, LLC, d/b/a)
TIMESHARE EXIT TEAM, a Washington limited)
20 liability company; BRANDON REED, an individual)
and citizen of the State of Washington; TREVOR)
21 HEIN, an individual and citizen of Canada;)
THOMAS PARENTEAU, an individual and citizen)
22 of the State of Washington; HAPPY HOUR MEDIA)
GROUP, LLC, a Washington limited liability)
23 company; MITCHELL REED SUSSMAN, ESQ.)
d/b/a THE LAW OFFICES OF MITCHELL REED)
24 SUSSMAN & ASSOCIATES, an individual citizen)
of the State of California; SCHROETER,)
25 GOLDMARK & BENDER, P.S. A Washington)
professional services corporation; and KEN B.)
26 PRIVETT, ESQ., a citizen of Oklahoma,)

27 Defendants.
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Case No.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
ANSWER TO AMENDED
COMPLAINT [ECF NO. 59]**

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**STIPULATION AND ORDER TO EXTEND TIME TO FILE ANSWER
TO AMENDED COMPLAINT [ECF NO. 59]**

Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS INTERNATIONAL, INC.; DIAMOND RESORTS CORPORATION; DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC; and DIAMOND RESORTS MANAGEMENT, INC., ("Plaintiffs"), and Defendants REED HEIN & ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM; BRANDON REED; and TREVOR HEIN ("Reed Hein Defendants"), by and through their respective attorneys of record, stipulate as follows:

STIPULATION

1. Plaintiffs filed their Complaint on December 6, 2017 [ECF No. 1].
2. The Reed Hein Defendants filed a motion to dismiss. [ECF No. 22].
3. The Court dismissed certain claims and the individual defendants from the lawsuit and allowed Plaintiffs to file an amended complaint. [ECF No. 50].
4. Plaintiffs filed their Amended Complaint for Damages and Injunctive Relief ("Amended Complaint") on January 4, 2019 [ECF No. 59].
5. The Amended Complaint is 50 pages long with 232 separate paragraphs of allegations, nearly 100 more than the Complaint.
6. The Amended Complaint adds 7 defendants, 5 of whom were never previously part of the litigation.
7. The Amended Complaint also includes 7 causes of action including 3 new causes of action which were not part of the original Complaint.
8. The Amended Complaint in this case involves complex business tort, unfair business practices, and false advertising.
9. Pursuant to Federal Rule of Civil Procedure 15, the current due date for the Reed Hein Defendants to respond to the Complaint is January 18, 2019.
10. The Reed Hein Defendants request an extension to allow them to fully review and respond to the allegations in the Complaint.
11. Additionally, an extension will promote judicial economy as it will allow the

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1 Reed Hein Defendants to determine whether a single response or separate responses to the
2 complaint will be necessary.

3 12. The Reed Hein Defendants request an additional thirty-eight (38) days to file their
4 responses to the complaint.

5 13. Plaintiffs' do not oppose the extension.

6 14. This stipulation is not made for purposes of delay.

7 15. Furthermore, because new parties are being added to the litigation, any extension
8 will have minimal impact on timing as those parties will need to be served and respond to the
9 complaint as well.

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16. Therefore, the parties agree that the Reed Hein Defendants' respective responses to the Complaint are now due on or before February 19, 2019.

DATED: January 29, 2019.

DATED: January 29, 2019.

GORDON REES SCULLY MANSUKHANI,
LLP

COOPER LEVENSON, P.A.

/s/ Robert S. Larsen

/s/ Daniel J. Barsky

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Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: 1/30/19

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